



*Protecting Southwest Florida's unique natural environment and quality of life ... now and forever.*

February 20, 2019

United States Environmental Protection Agency  
Tom McGill  
61 Forsyth St, S.W.  
Mail Code: 9T25  
Atlanta, GA 30303

RE: Florida Application for Approval of State 404 Program, 40 CFR § 233.15(e)

Dear Mr. McGill:

The Conservancy of Southwest Florida, on behalf of its over 7,000 supporting families and members, would like to state our interest as a stakeholder in the EPA's potential future consideration of an application by Florida for approval of a State 404 Program for dredge and fill wetlands permitting under the Clean Water Act.

Southwest Florida is home to many critical wetlands and waterways. We are extremely concerned that the assumption of this program by the State of Florida would result in less protection and review of these critical resources. Many of Florida's iconic and precious endangered wildlife, such as the Florida panther, wood stork, and Florida bonneted bat, rely on those very wetlands for habitat. Further, wetlands provide invaluable water quality and quantity benefits that contribute to our quality of life and economy.

The Conservancy is interested in tracking and being involved in the review of Florida's potential future application. It is our understanding that the EPA has a review process for proposed assumption package applications, including a public comment period.

It is also our understanding that once the agency deems a state's application complete, EPA must provide notice of the state's application to persons known to be interested in such matters in accordance with 40 C.F.R. § 233.15(e). The Conservancy requests to be provided such notice and to be informed of when the review process by the EPA begins, as we are concerned that assumption would have a deleterious effect on the future of Florida's environment.



Conservancy of Southwest Florida has been awarded Charity Navigator's prestigious 4-Star top rating for good governance, sound fiscal management and commitment to accountability and transparency. Charity Navigator is America's largest and most respected independent evaluator of charities.

1495 Smith Preserve Way | Naples, Florida 34102 | 239.282.0304 | Fax 239.282.0572 | [www.conservancy.org](http://www.conservancy.org)

The individuals who should receive notice on our behalf are:

- Amber Crooks: [amberc@conservancy.org](mailto:amberc@conservancy.org), (239) 262-0304 ext. 286;
- Andrea Fuchs: [andrea@conservancy.org](mailto:andrea@conservancy.org), (239) 262-0304 ext. 232; and
- Nicole Johnson: [nicolej@conservancy.org](mailto:nicolej@conservancy.org), (239) 262-0304 ext. 220.

Please do not hesitate to contact me at (239)262-0304, ext. 286, if you have any questions or concerns. We look forward to being involved in the review of any future submittal and intend to provide further input on these matters.

Sincerely,



Amber Crooks  
Environmental Policy Manager

cc: Mary S. Walker, Acting Regional Administrator, Region 4 EPA